

Message

From: Olson, Kyle [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D8F6BCA1F37C4780AB419DAB7B1D65FF-OLSON, KYLE]
Sent: 9/30/2021 8:09:35 PM
To: Richardson - CDPHE, Kristy [kristy.richardson@state.co.us]; Long - CDPHE, Jason [jason.long@state.co.us]
Subject: EtO Review & Meeting Request
Attachments: CDPHE ETHYLENE OXIDE MONITORING RPT.PDF; CDPHE Terumo Health Risk Assessment.pdf

Hi Kristy and Jason-

I'm reaching out about the commercial EtO Sterilizer Terumo BCT in Lakewood, CO. I understand you both are aware of the situation but since it's been a few years I wanted to send a summary and then a request for a meeting. The EPA is working on a new proposed rule that will affect the controls and permit limits for State-issued commercial sterilizers and has developed a list of facilities nation-wide that may be affected by the rule. The sole modelled high-risk facility in CO is Terumo BCT. Prior to working with the facility we wanted to reach out to you at the State to discuss the latest emissions estimates and modelled risk associated with this facility. Back in 2018 the EPA released the latest version of the National Air Toxics Assessment (NATA) which incorporated 2014 emissions data and a new, higher risk value for EtO based on the IRIS database (updated in 2016) that resulted in a lot of attention being paid to commercial EtO sterilizers. CDPHE, EPA, Jefferson County Health, and Terumo BCT then held a public open house in Dec of 2018 to share the monitoring and risk assessment (both attached) data with the public.

Now that the EPA has a better grasp on modeling commercial EtO sterilizers there is new data on these facilities that we need your help reviewing. We have been directed to conduct outreach to stakeholders at high risk facilities to better understand risk, emissions, and community concern. Terumo BCT has been flagged as having a large cancer risk due to fugitive emissions. The Agency is conducting this outreach 1) educate and inform impacted communities about the risks from these facilities and 2) increase participation from impacted community members in the rule making process for the current National Emission Standards for Hazardous Air Pollutants (NESHAP) for Commercial Ethylene Oxide Sterilization and Fumigation Operations. The first phase of this process is to share data with states to confirm emissions numbers and risk calculations. This is separate from the 2017 NEI data that we have been working on previously. We are hoping to set up a meeting with you all for the middle of next week to give you a presentation on our latest data and start conversations of how we can partner for outreach to communities.

From our side, our Air and Radiation Division Director, Carl Daly, would like to attend as well as our Public Affairs Division Director, Andrew Mutter. I wanted to tell you this so that we can get the correct people in the room for this discussion. I was wondering if there was anyone at the management level that you would also like to have me invite to a meeting sometime in the middle of next week. It may also work to have this meeting at the staff level initially, but we'll likely need to have our Directors speak with yours shortly thereafter, likely by the end of the week, to ensure that CO has officially reviewed the data.

Thanks,

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